

Bay Area Air Quality Management District

939 Ellis Street
San Francisco, CA 94109
(415) 771-6000

MAJOR FACILITY REVIEW PERMIT

Issued To:
Western Fiberglass, Inc.
Site #A7974

Site Address:
1555 Copperhill Pkwy.
Santa Rosa, CA 95403

Mailing Address:
1555 Copperhill Pkwy.
Santa Rosa, CA 95403
(707) 523-2050

Responsible Official - Michael E. Lewis, President
Facility Contact - Michael E. Lewis, President

| | |
|--------------------------|----------------------------|
| Type of Facility: | Fiberglass/Resin Operation |
| Primary SIC: | 3088 |
| Product: | Fiberglass Products |

ISSUED BY THE BAY AREA AIR QUALITY MANAGEMENT DISTRICT

Ellen J. Garvey, Air Pollution Control Officer

Date

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I. STANDARD CONDITIONS

Administrative Requirements

The permit holder shall comply with all applicable requirements in BAAQMD Regulation 1 - General Provisions and Definitions (11/3/93); SIP Regulation 1 - General Provisions and Definitions (3/17/82); BAAQMD Regulation 2, Rule 1 - Permits, General Requirements (6/7/95); SIP Regulation 2, Rule 1 - Permits, General Requirements (2/1/95); BAAQMD Regulation 2, Rule 2 - Permits, New Source Review (6/7/95); SIP Regulation 2, Rule 2 - Permits, New Source Review and Prevention of Significant Deterioration (12/1/82); and BAAQMD Regulation 2, Rule 4 - Permits, Emissions Banking (6/15/94).

Conditions to Implement Regulation 2, Rule 6, Major Facility Review

This Major Facility Review Permit expires on ***[ENTER DATE 5 YEARS AFTER ISSUANCE]***. The permit holder shall submit a complete application for renewal of this Major Facility Review Permit no later than ***[6 MONTHS PRIOR TO EXPIRATION]*** and no earlier than ***[ONE YEAR PRIOR TO EXPIRATION]***. **If a complete application for renewal has not been submitted in accordance with these deadlines, the facility may not operate after *[DAY PRIOR TO EXPIRATION]*.** (Regulation 2-6-307, 404.2, & 409.6; MOP Volume II, Part 3, §4.2)

The permit holder shall comply with all conditions of this permit. Any non-compliance with the terms and conditions of this permit will constitute a violation of the law and will be grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. (Regulation 2-6-409.7; MOP Volume II, Part 3, §4.11)

In the event any enforcement action is brought as a result of a violation of any term or condition of this permit, the fact that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with such term or condition shall not be a defense to such enforcement action. (MOP Volume II, Part 3, §4.11)

This permit may be modified, revoked, reopened and reissued, or terminated for cause. (Regulation 2-6-307, 409.8, 415; MOP Volume II, Part 3, §4.11)

The filing of a request by the facility for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated non-compliance does not stay the applicability of any permit condition. (Regulation 2-6-409.7; MOP Volume II, Part 3, §4.11)

This permit does not convey any property rights of any sort, nor any exclusive privilege. (Regulation 2-6-409.7; MOP Volume II, Part 3, §4.11)

The permit holder shall supply any information that the District requests in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit within 30 days. (Regulation 1-441, Regulation 2-6-409.4 & 501; MOP Volume II, Part 3, §4.11)

Any records required to be maintained pursuant to this permit which the permittee considers to contain proprietary or trade secret information shall be prominently designated as such. Copies of any such proprietary or trade secret information which are provided to the District shall be maintained by the District in a locked confidential file, provided, however, that requests from

I. Standard Conditions (continued)

the public for the review of any such information shall be handled in accordance with the District's procedures set forth in Section 11 of the District Administrative Code. (Regulation 2-6-419; MOP Volume II, Part 3, §4.11)

The emissions inventory submitted with the application for this Major Facility Review Permit is an estimate of actual emissions for the time period stated and is included only as one means of determining applicable requirements for emission sources. It does not establish, or constitute a basis for establishing, any new emission limitations. (MOP Volume II, Part 3, §4.11)

Minor Permit Modification Procedures

Notwithstanding the provisions set forth in Regulation 2, Rule 6, Major Facility Review, Section 411, Reports to EPA and Public Petitions for Major Facility Review Permits; Section 412, Public Participation, Major Facility Review Permit Issuance; and Section 414, Minor Permit Modification Procedures:

1. Advance public notice and EPA review shall not be required for any proposed minor permit modification. Once per calendar quarter, the District shall publish a list that includes any minor permit modification issued during the previous quarter.
2. For any minor permit modification involving an emission increase from any source or group of sources equal to or greater than: 5 tons per year of a regulated air pollutant; 2 tons per year of any single hazardous air pollutant; and 5 tons per year of any combination of hazardous air pollutants, the District shall provide to EPA a copy of each relevant application or a summary of the application, and a copy of each final permit revision.
3. For any minor permit modification involving an emission increase from any source or group of sources of less than: 5 tons per year of a regulated air pollutant, 2 tons per year of any single hazardous air pollutant; and 5 tons per year of any combination of hazardous air pollutants, the District shall not submit a copy of the relevant application, a summary of the application, or final permit revision to EPA. EPA shall not object to any permit modification involving an emission increase below the levels described herein. Such permit modifications shall be incorporated as attachments to this permit during the remaining term of the permit, and incorporated into the body of the permit as part of the five-year permit renewal.

Requirement to Pay Fees

The permit holder shall pay annual fees in accordance with District Regulation 3, including Schedule P. (Regulation 2-6-402 & 409.13, Regulation 3; MOP Volume II, Part 3, §4.12)

Inspection and Entry

Access to Facility: The permit holder shall provide reasonable access to the facility and equipment which is subject to this permit to the APCO and/or to his or her designee. (Regulation 1-440, Regulation 2-6-409.3; MOP Volume II, Part 3, §4.14)

Records

Notwithstanding the specific wording in any requirement, all records for federally enforceable requirements shall be maintained for at least five years from the date of entry. (Regulation 2-6-501, Regulation 3; MOP Volume II, Part 3, §4.7)

Monitoring Reports

I. Standard Conditions (continued)

All required monitoring reports must be submitted to the District at least once every six months. All instances of non-compliance shall be clearly identified in these reports. The reports shall be certified by the responsible official as true, accurate, and complete. (Regulation 2-6-502, Regulation 3; MOP Volume II, Part 3, §4.7)

Compliance Certification

Compliance certifications shall be submitted annually by the responsible official of this facility to the Bay Area Air Quality Management District and to the Environmental Protection Agency. (Regulation 2-6-409.9; MOP Volume II, Part 3, §4.15)

Emergency Provisions

The permit holder may seek relief from enforcement action in the event of a breakdown, as defined by Regulation 1-208 of the District's Rules and Regulations, by following the procedures contained in Regulations 1-431 and 1-432. The District will thereafter determine whether breakdown relief will be granted in accordance with Regulation 1-433. (MOP Volume II, Part 3, §4.8)

The permit holder may seek relief from enforcement action for a violation of any of the terms and conditions of this permit caused by conditions beyond the permit holder's reasonable control by applying to the District's Hearing Board for a variance pursuant to Health and Safety Code Section 42350. The Hearing Board will determine after notice and hearing whether variance relief should be granted in accordance with the procedures and standards set forth in Health and Safety Code Section 42350 et seq. Any variance granted by the Hearing Board from any term or condition of this permit which lasts longer than 90 days will be subject to EPA approval. (MOP Volume II, Part 3, §4.8)

Notwithstanding the foregoing, the granting by the District of breakdown relief or the issuance by the Hearing Board of a variance will not provide relief from federal enforcement unless the Major Facility Review Permit has been modified pursuant to Regulation 2, Rule 6. (MOP Volume II, Part 3, §4.8)

Severability

In the event that any provision of this permit is invalidated by a court or tribunal of competent jurisdiction, or by the Administrator of the EPA, all remaining portions of the permit shall remain in full force and effect. (Regulation 2-6-409.5; MOP Volume II, Part 3, §4.10)

II. EQUIPMENT LIST

A. Permitted Source List

Each of the following sources has been issued a permit to operate pursuant to the requirements of BAAQMD Regulation 2, Permits.

Table II A

| S-# | Description | Make or Type | Model | Capacity |
|------------|--------------------|---------------------|------------------|-----------------|
| S-1 | Filament Winder | Durawound | Model 10-C | N/A |
| S-2 | Closed Mold Vacuum | RTM Gun | Model 20210-00 | N/A |
| S-3 | Chopper Guns (2) | Glas-Craft | Model LPA-II-AAC | N/A |

B. Abatement Device List

Each of the following abatement devices has been issued a permit to operate pursuant to the requirements of BAAQMD Regulation 2, Permits.

Table II B

| A-# | Description | Make or Type | Model | Capacity |
|------------|--------------------|---------------------|--------------|-------------------------|
| A-1 | Filter | N/A | N/A | 2" by 48ft ² |

III. GENERALLY APPLICABLE EMISSION REQUIREMENTS

The permit holder shall comply with the applicable requirements specified in the BAAQMD and SIP Rules and Regulations cited below. The District has determined that these requirements would not be violated under normal, routine operations, and that no additional periodic monitoring or reporting to demonstrate compliance is warranted. In cases where a requirement, in addition to being generally applicable, is also specifically applicable to one or more sources, the requirement and the source are also included in Part IV, Applicable Requirements, and Part VI, Applicable Emission Limits & Compliance Monitoring Requirements, of this permit. The dates in parenthesis in the Title column are the dates of adoption or most recent amendment or for SIP requirements, the most recent date of EPA approval.

Table III

| Applicable Requirement | Regulation Title or Description of Requirement | SIP-approved/ FE (Y/N) | Sources/Operations Covered |
|-------------------------------|------------------------------------------------------------|-------------------------------|------------------------------------------------------------------------------------------------------|
| BAAQMD Regulation 1 | General Provisions and Definitions (11/3/93) | Y ¹ | all |
| | | | |
| BAAQMD Regulation 4 | Air Pollution Episode Plan (3/20/91) | Y | facility |
| | | | |
| BAAQMD Regulation 5 | Open Burning (11/2/94) | Y ¹ | facility |
| | | | |
| BAAQMD Regulation 6 | Particulate Matter and Visible Emissions (12/19/90) | | |
| 6-301 | Ringelmann Number 1 Limitation | N ¹ | all, except temporary sandblasting, open fires, and operations subject to BAAQMD §6-303, 304, or 306 |
| 6-303 | Ringelmann Number 2 Limitation | Y | sources listed in subsections |
| 6-305 | Visible Particles | Y | all, except temporary sandblasting and open fires |

(continued)

III. Generally Applicable Emission Requirements (continued)

Table III (continued)

| Applicable Requirement | Regulation Title or Description of Requirement | SIP-approved/ FE (Y/N) | Sources/Operations Covered |
|-------------------------------------|------------------------------------------------------------------|-------------------------------|---------------------------------------------------------------------------------------------------------------------|
| 6-310 | Particulate Weight Limitation | Y | all, except temporary sandblasting and open fires |
| 6-401 | Appearance of Emissions | Y | all |
| | | | |
| BAAQMD Regulation 7 | Odorous Substances (3/17/82) | N | all |
| | | | |
| BAAQMD Regulation 8, Rule 1 | Organic Compounds - General Provisions (6/15/94) | Y | solvent cleaning operations, except operations subject to Reg. 8-2 or 8-4 which meet minimum abatement requirements |
| | | | |
| BAAQMD Regulation 8, Rule 3 | Organic Compounds - Architectural Coatings (12/20/95) | Y ¹ | application of architectural coating |
| | | | |
| BAAQMD Regulation 8, Rule 16 | Organic Compounds - Solvent Cleaning Operations (6/15/94) | | |
| 8-16-111 | Exemption, Wipe Cleaning | Y | wipe cleaning operations |
| 8-16-114 | Exemption, Emulsion or Solution Cleaners | Y | operations exclusively using emulsion or solution cleaners containing < 1 wt% VOC |
| 8-16-115 | Exemption, Small, Unheated Solvent Cleaning Equipment | Y | unheated equipment containing < 1 gal solvent or evaporative area < 1 ft ² |
| 8-16-118.2 | Limited Exemption, Compound with Low Volatility - Cold Cleaners | Y | cold cleaners using low volatility compounds |

(continued)

III. Generally Applicable Emission Requirements (continued)

Table III (continued)

| Applicable Requirement | Regulation Title or Description of Requirement | SIP-approved/ FE (Y/N) | Sources/Operations Covered |
|-------------------------------------|-------------------------------------------------------------------------------------------|-------------------------------|--------------------------------------------------------------------------------------|
| 8-16-119 | Limited Exemption, Sealed Chamber Solvent Cleaners | Y | sealed chamber solvent cleaners |
| 8-16-303 | Cold Cleaner Requirements | Y | cold solvent cleaners |
| 8-16-304 | Trichloroethylene Limitation | Y | all solvent cleaning operations |
| 8-16-501 | Solvent Records | Y | all solvent cleaning operations, except cold cleaners using low volatility compounds |
| | | | |
| BAAQMD Regulation 8, Rule 49 | Organic Compounds - Aerosol Paint Products (12/20/95) | Y ¹ | application of or specifications for aerosol products |
| | | | |
| BAAQMD Regulation 8, Rule 51 | Organic Compounds - Adhesive and Sealant Products (12/20/95) | N | application or specification of adhesive or sealant products |
| | | | |
| BAAQMD Regulation 11, Rule 2 | Hazardous Pollutants - Asbestos Demolition, Renovation and Manufacturing (12/4/91) | Y | asbestos surfacing/coating, installation, demolition, disposal |
| | | | |
| BAAQMD Regulation 12, Rule 4 | Miscellaneous Standards of Performance - Sandblasting (7/11/90) | Y ¹ | non-permanent abrasive blasting operations |

¹ There are differences between the current BAAQMD rule and the version of the rule in the SIP. For specific information, contact the District's Rule Development Section of the Enforcement Division. All sources must comply with both versions of the rule until US EPA has reviewed and approved (or disapproved) the District's revision of the regulation.

IV. APPLICABLE REQUIREMENTS

The permit holder shall comply with all requirements specified in the sections of the applicable rules and regulations and permit conditions cited below. The text of all permit conditions cited is included in Part V, Permit Conditions, of this permit. All other text may be found in the regulations themselves. The dates in parenthesis in the Regulation Title column are the dates of adoption or most recent amendment or for SIP requirements, the most recent date of EPA approval.

Table IV A

S-1 Filament Winder

| Applicable Requirement | Regulation Title or Description of Requirement | SIP-approved/ FE (Y/N) | Future Effective Date |
|-------------------------------------|------------------------------------------------------------------|-------------------------------|------------------------------|
| BAAQMD Regulation 8, Rule 50 | Organic Compounds - Polyester Resin Operations (12/20/95) | | |
| 8-50-110 | Limited Exemption, Touch-up and Repair | Y | |
| 8-50-220 ² | Volatile Organic Compound | N | |
| 8-50-301 | Process Requirements | Y | |
| 8-50-301.1 | Monomer ≤ 35 wt% | Y | |
| 8-50-301.2 | Vapor Suppressant & VOC Emission $\leq 60\text{g/m}^2$ | Y | |
| 8-50-304 | Corrosion-resistant Materials | Y | |
| 8-50-305 | Surface Preparation and Clean-up Solvent | Y | |
| 8-50-305.1 | Storage in Closed Containers | Y | |
| 8-50-305.2 | Self-closing Containers, Disposal | Y | |
| 8-50-305.3 | Minimizing Organic Emissions from Spray Equipment Clean-up | Y | |
| 8-50-305.4 | Clean-up Solvent, VOC $\leq 200\text{g/liter}$ | Y | |
| 8-50-307 | Gel Coat Requirement | Y | |

(continued)

IV. Applicable Requirements (continued)

Table IV A (continued)

| Applicable Requirement | Regulation Title or Description of Requirement | SIP-approved/ FE (Y/N) | Future Effective Date |
|----------------------------------|--------------------------------------------------------------------------------------------------------------|-------------------------------|------------------------------|
| 8-50-501 | Records | Y | |
| 8-50-501.1 | List of Materials Used | Y | |
| 8-50-501.2 | List VOC Content of Materials Used | Y | |
| 8-50-501.3 | Vapor-suppressed Resin Records | Y | |
| 8-50-501.4 | Daily Usage Records | Y | |
| 8-50-501.5 | Record Retention for 24 months | Y | |
| | | | |
| SIP Regulation 8, Rule 50 | PROVISIONS NO LONGER IN CURRENT DISTRICT RULE Organic Compounds - Polyester Resin Operations (5/8/95) | | |
| 8-50-220 ² | Volatile Organic Compound | Y ³ | |
| | | | |
| BAAQMD Cond. #9303 | | | |
| Part 1 | Usage (basis: cumulative increase) | Y | |
| Part 2 | Material Usage Specifications (basis: cumulative increase) | Y | |
| Part 3 | Record Keeping (basis: cumulative increase) | Y | |
| Part 4 | Annual Review Available Vapor Suppressants/Low Monomer Resins (basis: BACT) | Y | |

² This section is a definition, not an applicable requirement. However, it affects the applicable requirements of the regulation. As it is the only difference between the SIP and BAAQMD regulation requirements, it has been included in the permit to explain the difference between the applicable requirements.

³ This section has been removed from BAAQMD Regulations because it has been superseded. Nevertheless, the source must comply with this regulation until US EPA has reviewed and approved (or disapproved) the District's revision of the regulation.

IV. Applicable Requirements (continued)

Table IV B

S-2 Closed Mold Vacuum

| Applicable Requirement | Regulation Title or Description of Requirement | SIP-approved/ FE (Y/N) | Future Effective Date |
|-------------------------------------|------------------------------------------------------------------|-------------------------------|------------------------------|
| BAAQMD Regulation 8, Rule 50 | Organic Compounds - Polyester Resin Operations (12/20/95) | | |
| 8-50-110 | Limited Exemption, Touch-up and Repair | Y | |
| 8-50-203 | Closed Mold System | N | |
| 8-50-220 ² | Volatile Organic Compound | N | |
| 8-50-301 | Process Requirements | Y | |
| 8-50-301.1 | Monomer ≤ 35 wt% | Y | |
| 8-50-301.2 | Vapor Suppressant & VOC Emission $\leq 60\text{g/m}^2$ | Y | |
| 8-50-304 | Corrosion-resistant Materials | Y | |
| 8-50-305 | Surface Preparation and Clean-up Solvent | Y | |
| 8-50-305.1 | Storage in Closed Containers | Y | |
| 8-50-305.2 | Self-closing Containers, Disposal | Y | |
| 8-50-305.3 | Minimizing Organic Emissions from Spray Equipment Clean-up | Y | |
| 8-50-305.4 | Clean-up Solvent, VOC $\leq 200\text{g/liter}$ | Y | |
| 8-50-307 | Gel Coat Requirement | Y | |

(continued)

IV. Applicable Requirements (continued)

Table IV B (continued)

| Applicable Requirement | Regulation Title or Description of Requirement | SIP-approved/FE (Y/N) | Future Effective Date |
|----------------------------------|---------------------------------------------------------------------------------------------------------|------------------------------|------------------------------|
| 8-50-501 | Records | Y | |
| 8-50-501.1 | List of Materials Used | Y | |
| 8-50-501.2 | List VOC Content of Materials Used | Y | |
| 8-50-501.3 | Vapor-suppressed Resin Records | Y | |
| 8-50-501.4 | Daily Usage Records | Y | |
| 8-50-501.5 | Record Retention for 24 months | Y | |
| | | | |
| SIP Regulation 8, Rule 50 | PROVISIONS NO LONGER IN CURRENT RULE Organic Compounds - Polyester Resin Operations (5/8/95) | | |
| 8-50-220 ² | Volatile Organic Compound | Y ³ | |
| | | | |
| BAAQMD Cond #9303 | | | |
| Part 5 | Usage (basis: cumulative increase) | Y | |
| Part 6 | Material Usage Specifications (basis: cumulative increase) | Y | |
| Part 7 | Record Keeping (basis: cumulative increase) | Y | |

² This section is a definition, not an applicable requirement. However, if affects the applicable requirements of the regulation. As it is the only difference between the SIP and BAAQMD regulation requirements, it has been included in the permit to explain the difference between the applicable requirements.

³ This section has been removed from BAAQMD Regulations because it has been superseded. Nevertheless, the source must comply with this regulation until US EPA has reviewed and approved (or disapproved) the District's revision of the regulation.

IV. Applicable Requirements (continued)

Table IV C

S-3 Chopper Guns (2)

| Applicable Requirement | Regulation Title or Description of Requirement | SIP-approved/ FE (Y/N) | Future Effective Date |
|-------------------------------------|------------------------------------------------------------------|-------------------------------|------------------------------|
| BAAQMD Regulation 8, Rule 50 | Organic Compounds - Polyester Resin Operations (12/20/95) | | |
| 8-50-110 | Limited Exemption, Touch-up and Repair | Y | |
| 8-50-220 ² | Volatile Organic Compound | N | |
| 8-50-301 | Process Requirements | Y | |
| 8-50-301.1 | Monomer ≤ 35 wt% | Y | |
| 8-50-301.2 | Vapor Suppressant & VOC Emission $\leq 60\text{g/m}^2$ | Y | |
| 8-50-302 | Spraying Operations | Y | |
| 8-50-302.1 | Airless Spray | Y | |
| 8-50-302.2 | Air-Assisted Airless Spray | Y | |
| 8-50-302.3 | Electrostatic Spray | Y | |
| 8-50-302.4 | HVLP | Y | |
| 8-50-304 | Corrosion-resistant Materials | Y | |
| 8-50-305 | Surface Preparation and Clean-up Solvent | Y | |
| 8-50-305.1 | Storage in Closed Containers | Y | |
| 8-50-305.2 | Self-closing Containers, Disposal | Y | |
| 8-50-305.3 | Minimizing Organic Emissions from Spray Equipment Clean-up | Y | |
| 8-50-305.4 | Clean-up Solvent, VOC $\leq 200\text{g/liter}$ | Y | |
| 8-50-307 | Gel Coat Requirement | Y | |

(continued)

IV. Applicable Requirements (continued)

Table IV C (continued)

| Applicable Requirement | Regulation Title or Description of Requirement | SIP-approved/ FE (Y/N) | Future Effective Date |
|----------------------------------|---------------------------------------------------------------------------------------------------------|-------------------------------|------------------------------|
| 8-50-501 | Records | Y | |
| 8-50-501.1 | List of Materials Used | Y | |
| 8-50-501.2 | List VOC Content of Materials Used | Y | |
| 8-50-501.3 | Vapor-suppressed Resin Records | Y | |
| 8-50-501.4 | Daily Usage Records | Y | |
| 8-50-501.5 | Record Retention for 24 months | Y | |
| | | | |
| SIP Regulation 8, Rule 50 | PROVISIONS NO LONGER IN CURRENT RULE Organic Compounds - Polyester Resin Operations (5/8/95) | | |
| 8-50-220 ² | Volatile Organic Compound | Y ³ | |
| | | | |
| BAAQMD Cond. #9303 | | | |
| Part 8 | Usage (basis: cumulative increase) | Y | |
| Part 9 | Material Usage Specifications (basis: cumulative increase) | Y | |
| Part 10 | Record Keeping (basis: cumulative increase) | Y | |
| Part 11 | Annual Review Available Vapor Suppressants/Low Monomer Resins (basis: BACT) | Y | |
| Part 12 | All Spray Operations Must Be In Building (basis: BACT) | Y | |
| Part 13 | Only One Spray Gun May Be Operated At One Time (basis: BACT) | Y | |

² This section is a definition, not an applicable requirement. However, if affects the applicable requirements of the regulation. As it is the only difference between the SIP and BAAQMD regulation requirements, it has been included in the permit to explain the difference between the applicable requirements.

³ This section has been removed from BAAQMD Regulations because it has been superseded. Nevertheless, the source must comply with this regulation until US EPA has reviewed and approved (or disapproved) the District's revision of the regulation.

V. PERMIT CONDITIONS

Any condition that is preceded by an asterisk is not federally enforceable.

A. Source Specific Permit Conditions

Condition # 9303

For S-1, Filament Winder:

1. The net resin and cleanup solvent usage at S-1 shall not exceed the following limits during any consecutive 365 day period (a) 600 gallons cleaning solvent, (b) 20,000 gallons resin as applied; unless the operator can demonstrate to the satisfaction of the District, through daily recordkeeping and POC calculations, that precursor organic compound emissions from the operation of S-1 are below 7559 pounds during any consecutive 365 day period. (basis: cumulative increase)
2. Only the following materials or their chemical equivalents shall be used at S-1.
Cleaning Solvent: Glas-Craft TGC FRP Tool and Gun
Cleaner
Resin: Ashland Aropol L-5505T-20 Resin
Catalyst: Methyl Ethyl Ketone Peroxide
Before using an alternate material at S-1, the owner/operator shall first apply for and receive written approval from the District. (basis: cumulative increase)
3. To demonstrate compliance with the above conditions, the following records shall be kept on site and made available for District inspection for a period of at least 24 months from the date on which a record was made. (basis: cumulative increase)
 - a) The type and quantity of cleanup solvent, resin and catalyst used daily. The type and quantities of these materials used for touch-up and repair shall be logged separately.
 - b) Maintain a list of resins and cleanup solvents including the weight % VOC, or monomer content, of the resin and the grams of VOC per liter of cleanup solvent.
 - c) Monthly totals of daily quantities
4. Western Fiberglass shall review, on an annual basis, the commercial availability of vapor suppressants and lower monomer content resins which could be used to manufacture corrosive resistant products at S-1, and shall use these products at S-1 as soon as they are available. Western Fiberglass shall submit the results of the commercial availability review to the District, each year prior to permit renewal. (basis: cumulative increase)

V. Permit Conditions (continued)

Condition # 9303 (continued)

For S-2, Closed Mold Vacuum:

5. The net resin and cleanup solvent usage at S-2 shall not exceed the following limits during any consecutive 365 day period (a) 600 gallons cleaning solvent, (b) 30,000 gallons resin as applied; unless the operator can demonstrate to the satisfaction of the District, through daily recordkeeping and POC calculations, that precursor organic compound emissions from the operation of S-2 are below 3453 pounds during any consecutive 365 day period. (basis: cumulative increase)
6. Only the following materials or their chemical equivalents shall be used at S-2.

| | |
|-------------------|-----------------------------------------|
| Cleaning Solvent: | Glas-Craft TGC FRP Tool and Gun Cleaner |
| Resin: | Ashland Aropol 7241 RT |
| Catalyst: | Methyl Ethyl Ketone Peroxide |

Before using an alternate material at S-2, the owner/operator shall first apply for and receive written approval from the District. (basis: cumulative increase)
7. To demonstrate compliance with the above conditions, the following records shall be kept on site and made available for District inspection for a period of at least 24 months from the date on which a record was made. (basis: cumulative increase)
 - a) The type and quantity of cleanup solvent, resin and catalyst used and recycled daily. The type and quantities of these materials used and recycled for touch-up and repair shall be logged separately.
 - b) Maintain a list of resins and cleanup solvents including the weight % VOC, or monomer content, of the resin and the grams of VOC per liter of cleanup solvent.
 - c) Monthly totals of daily quantities

For S-3, Chopper Guns

8. The net resin and cleanup solvent usage at S-3 shall not exceed the following limits during any consecutive 365 day period (a) 600 gallons cleaning solvent, (b) 30,000 gallons resin as applied; unless the operator can demonstrate to the satisfaction of the District, through daily recordkeeping and POC calculations, that precursor organic compound emissions from the operation of S-3 are below 15,814 pounds during any consecutive 365 day period. (basis: cumulative increase)

V. Permit Conditions (continued)

Condition # 9303 (continued)

For S-3, Chopper Guns (continued)

9. Only the following materials or their chemical equivalents shall be used at S-3.

Cleaning Solvent:

Glas-Craft TGC FRP Tool and Gun
Cleaner

Resin:

Ashland Aropol L-5505T-20 Resin

Catalyst:

Methyl Ethyl Ketone Peroxide

Before using an alternate material at S-3, the owner/operator shall first apply for and receive written approval from the District. (basis: cumulative increase)

10. To demonstrate compliance with the above conditions, the following records shall be kept on site and made available for District inspection for a period of at least 24 months from the date on which a record was made. (basis: cumulative increase)
- a) The type and quantity of cleanup solvent, resin and catalyst used daily. The type and quantities of these materials used for touch-up and repair shall be logged separately.
 - b) Maintain a list of resins and cleanup solvents including the weight % VOC, or monomer content, of the resin and the grams of VOC per liter of cleanup solvent.
 - c) Monthly totals of daily quantities
11. Western Fiberglass shall review, on an annual basis, the commercial availability of vapor suppressants and lower monomer content resins which could be used to manufacture corrosive resistant products at S-3, and shall use these products at S-3 as soon as they are available. Western Fiberglass shall submit the results of the commercial availability review to the District, each year prior to permit renewal. (basis: BACT)
12. The spray area and all associated spray operations shall be contained within the building. (basis: BACT)
13. In no case, shall more than one chopper gun operate at any time. (basis: BACT)

VI. APPLICABLE EMISSION LIMITS & COMPLIANCE MONITORING REQUIREMENTS

The following tables indicate the type of compliance monitoring required for each applicable emission limit. The monitoring frequency indicates whether periodic (P) or continuous (C) monitoring is required. No monitoring (N) has been required if the current applicable rule or regulation does not require monitoring and the operation is unlikely to deviate from the applicable emission limit based upon the nature of the operation.

Table VI A

S-1 FILAMENT WINDER

| Pollutant | Emission Limit Citation | FE Y/N | Future Effective Date | Emission Limit | Monitoring Requirement Citation | Monitoring Frequency (P/C/N) | Monitoring Type |
|-----------|---------------------------------|--------|-----------------------|---------------------------------------------------------------|---------------------------------|------------------------------|-----------------|
| VOC | Regulation 8-50-301.1 | Y | | monomer content \leq 35% by weight | Regulation 8-50-501.2 | P | records |
| | Regulation 8-50-301.2 | Y | | weight loss/emissions \leq 60 g/m ² surface area | Regulation 8-50-501.3 | P | records |
| | Regulation 8-50-304 | Y | | monomer content \leq 50% by weight | Regulation 8-50-501.2 | P | records |
| | Regulation 8-50-305.4 | Y | | content of cleaning material \leq 200 g/liter | Regulation 8-50-501.2 | P | records |
| | Regulation 8-50-307 | Y | | content of gel coat, as applied \leq 250 g/liter | Regulation 8-50-501.2 | P | records |
| | BAAQMD Cond.#930 3 Part 1 | Y | | 7559 lb per 365 consecutive days | Regulation 8-50-501.4 | P | records |

VI. Applicable Emission Limits & Compliance Monitoring Reqs. (continued)

Table VI B

S-2 CLOSED MOLD VACUUM

| Pollutant | Emission Limit Citation | FE Y/N | Future Effective Date | Emission Limit | Monitoring Requirement Citation | Monitoring Frequency (P/C/N) | Monitoring Type |
|------------------|---------------------------------|---------------|------------------------------|----------------------------------------------------------|----------------------------------------|-------------------------------------|------------------------|
| VOC | Regulation 8-50-301.1 | Y | | monomer content ≤ 35% by weight | Regulation 8-50-501.2 | P | records |
| | Regulation 8-50-301.2 | Y | | weight loss/emissions ≤ 60 g/m ² surface area | Regulation 8-50-501.3 | P | records |
| | Regulation 8-50-304 | Y | | monomer content ≤ 50% by weight | Regulation 8-50-501.2 | P | records |
| | Regulation 8-50-305.4 | Y | | content of cleaning material ≤ 200 g/liter | Regulation 8-50-501.2 | P | records |
| | Regulation 8-50-307 | Y | | content of gel coat, as applied ≤ 250 g/liter | Regulation 8-50-501.2 | P | records |
| | BAAQMD Cond.#930 3 Part 5 | Y | | 3453 lb per 365 consecutive days | Regulation 8-50-501.4 | P | records |

Table VI C

S-3 CHOPPER GUNS (2)

| Pollutant | Emission Limit Citation | FE Y/N | Future Effective Date | Emission Limit | Monitoring Requirement Citation | Monitoring Frequency (P/C/N) | Monitoring Type |
|------------------|--------------------------------|---------------|------------------------------|----------------------------------------------------------|----------------------------------------|-------------------------------------|------------------------|
| VOC | Regulation 8-50-301.1 | Y | | monomer content ≤ 35% by weight | Regulation 8-50-501.2 | P | records |
| | Regulation 8-50-301.2 | Y | | weight loss/emissions ≤ 60 g/m ² surface area | Regulation 8-50-501.3 | P | records |
| | Regulation 8-50-304 | Y | | monomer content ≤ 50% by weight | Regulation 8-50-501.2 | P | records |
| | Regulation 8-50-305.4 | Y | | content of cleaning material ≤ 200 g/liter | Regulation 8-50-501.2 | P | records |
| | Regulation 8-50-307 | Y | | content of gel coat, as applied ≤ 250 g/liter | Regulation 8-50-501.2 | P | records |
| | BAAQMD | Y | | 15814 lb per 365 | Regulation | P | records |

Plant Name: Western Fiberglass, Inc.
Proposed Permit for Site #: A7974
Expiration Date: xx-xx-01
ID: KT

VI. Applicable Emission Limits & Compliance Monitoring Reqs.
(continued)

| | | | | | | | |
|--|--------------------------|--|--|------------------|------------|--|--|
| | Cond.#930 3 Part 8 | | | consecutive days | 8-50-501.4 | | |
|--|--------------------------|--|--|------------------|------------|--|--|

VII. TEST METHODS

The test methods associated with the emission limit of a District regulation are generally found in Section 600 of the regulation. The following table indicates only the test methods associated with the emission limits referenced in Section VI - Applicable Emission Limits & Compliance Monitoring Requirements.

Table VII

| Applicable Requirement | Description of Requirement | Acceptable Test Methods | EPA Approved |
|-------------------------------|-------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|
| BAAQMD Regulation 8-50-301.1 | Process Requirements, Monomer Content | Manual of Procedures, Volume III, Method 39, Determination of Styrene Monomer Content of Polyester Resin Material | Y |
| BAAQMD Regulation 8-50-301.2 | Process Requirements, Vapor Suppressed Resins | Manual of Procedures, Volume III, Method 23, Determination of Volatile Emissions from Polyester Resins | Y |
| BAAQMD Regulation 8-50-304 | Corrosion-resistant Materials | Manual of Procedures, Volume III, Method 23, Determination of Volatile Emissions from Polyester Resins | Y |
| BAAQMD Regulation 8-50-305.4 | Surface Preparation and Clean-up Solvent, VOC Content | Manual of Procedures, Volume III, Method 31, Determination of Volatile Organic Compounds in Paint Strippers, Solvent Cleaners, and Low Solids Coatings | N |
| BAAQMD Regulation 8-50-307 | Gel Coat Requirement | Manual of Procedures, Volume III, Method 26, Determination of Volatile Weight Loss of Gel Coats | Y |

VIII. GLOSSARY

BAAQMD

Bay Area Air Quality Management District

BACT

Best Available Control Technology

CAA

The federal Clean Air Act

CEQA

California Environmental Quality Act

CFR

The Code of Federal Regulations. 40 CFR contains the implementing regulations for federal environmental statutes such as the Clean Air Act. Parts 50-99 of 40 CFR contain the requirements for air pollution programs.

Cumulative Increase

The sum of permitted emissions from each new or modified source since a specified date. Used to determine whether threshold-based requirements are triggered.

District

The Bay Area Air Quality Management District

EPA

The federal Environmental Protection Agency.

Excluded

Not subject to any District Regulations.

Federally Enforceable, FE

All limitations and conditions which are enforceable by the Administrator of the EPA including those requirements developed pursuant to 40 CFR Part 51, subpart I (NSR), Part 52.21 (PSD), Part 60, (NSPS), Part 61, (NESHAPs), Part 63 (HAP), and Part 72 (Permits Regulation, Acid Rain), and also including limitations and conditions contained in operating permits issued under an EPA-approved program that has been incorporated into the SIP.

HAP

VIII. Glossary (continued)

Hazardous Air Pollutant. Any pollutant listed pursuant to Section 112(b) of the Act. Also refers to the program mandated by Title I, Section 112, of the Act and implemented by both 40 CFR Part 63, and District Regulation 2, Rule 5.

Major Facility

A facility with potential emissions of regulated air pollutants greater than or equal to 100 tons per year, greater than or equal to 10 tons per year of any single hazardous air pollutant, and/or greater than or equal to 25 tons per year of any combination of hazardous air pollutants, or such lesser quantity as determined by the EPA administrator.

MFR

Major Facility Review. The District's term for the federal operating permit program mandated by Title V of the Act and implemented by District Regulation 2, Rule 6.

MOP

The District's Manual of Procedures.

NESHAPs

National Emission Standards for Hazardous Air Pollutants. Contained in 40 CFR Part 61.

NMHC

Non-methane Hydrocarbons

NSR

New Source Review. A federal program for preconstruction review and permitting of new and modified sources of air pollutants for which the District is classified "non-attainment". Mandated by Title I of the Clean Air Act and implemented by 40 CFR Parts 51 and 52 as well as District Regulation 2, Rule 2. (Note: There are additional NSR requirements mandated by the California Clean Air Act.)

Offset Requirement

A New Source Review requirement to provide federally enforceable emission offsets at a specified ratio for the emissions from a new or modified source and any pre-existing cumulative increase minus any on site contemporaneous emission reduction credits. Applies to emissions of POC, NO_x, PM₁₀, and SO₂.

POC

Precursor Organic Compounds

PM

Total Particulate Matter

PM₁₀

Particulate matter with aerodynamic equivalent diameter of less than or equal to 10 microns

VIII. Glossary (continued)

PSD

Prevention of Significant Deterioration. A federal program for permitting new and modified sources of air pollutants for which the District is classified "attainment" of the National Air Ambient Quality Standards. Mandated by Title I of the Act and implemented by both 40 CFR Part 52 and District Regulation 2, Rule 2.

SIP

State Implementation Plan. State and District programs and regulations approved by EPA and developed in order to attain the National Ambient Air Quality Standards. Mandated by Title I of the Act.

Title V

Title V of the federal Clean Air Act. Requires a federally enforceable operating permit program for major and certain other facilities.

VOC

Volatile Organic Compounds

Units of Measure:

| | | |
|----------------|---|----------------------------------|
| g | = | grams |
| gal | = | gallon |
| hr | = | hour |
| lb | = | pound |
| in | = | inches |
| max | = | maximum |
| m ² | = | square meter |
| min | = | minute |
| psia | = | pounds per square inch, absolute |
| scfm | = | standard cubic feet per minute |
| yr | = | year |